

RAINES FELDMAN LITRELL, LLP
Kyra E. Andrassy, State Bar No. 207959
kandrassy@raineslaw.com
Timothy W. Evanston, State Bar No. 319342
tevanston@raineslaw.com
3200 Park Center Drive, Suite 250
Costa Mesa, CA 92626
Telephone: (310) 440-4100
Facsimile: (310) 499-4877

Counsel for Elissa D. Miller, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

GIRARDI KEESE,

Debtor.

Case No.: 2:20-bk-21022-BR

Chapter: 7

**THIRD MOTION TO ABANDON
QUANTUM MERUIT CLAIMS AND
COSTS UNDER 11 U.S.C. § 554;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
ELISSA D. MILLER IN SUPPORT**

[No hearing required pursuant to Local
Bankruptcy Rule 9013-1(o)]

1 **TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY**
2 **JUDGE:**

3 Elissa D. Miller, the chapter 7 trustee (the "Trustee") for the bankruptcy estate (the
4 "Estate") of Girardi Keese (the "Debtor"), submits this *Third Motion for Order Authorizing*
5 *Abandonment of Quantum Meruit Claims and Costs Related to Certain Cases Pursuant to 11*
6 *U.S.C. § 554* (the "Motion"). In support of the Motion, the Trustee submits the following
7 memorandum of points and authorities and the declaration of Elissa D. Miller.

8
9 **I. INTRODUCTION**

10 The Debtor was a prominent law firm in Los Angeles, California. The Debtor had a
11 large number of cases which were still pending when its order for relief was entered and which
12 are in varying stages of litigation. Where there is a basis for doing so, the Trustee has
13 negotiated with the new lawyers regarding the Debtor's quantum meruit claim and
14 reimbursement of costs. However, there are a handful of cases where the Trustee does not
15 believe there is a basis for asserting a quantum meruit claim and where the costs are
16 appropriately waived or reduced. Accordingly, the Trustee requests that she be authorized to
17 abandon the Debtor's interest in the fees and/or costs identified in this Motion. This is the
18 third such motion that the Trustee has filed.

19
20 **II. BACKGROUND**

21 **A. The Debtor's Involuntary Case**

22 The Debtor was a plaintiff's law firm based in Los Angeles, California. On December
23 18, 2020, petitioning creditors Jill O'Callahan, as successor in interest to James O'Callahan,
24 Robert M. Keese, John Abassian, Erika Saldana, Virginia Antonio, and Kimberly Archie
25 (collectively, the "Petitioning Creditors") filed an involuntary chapter 7 bankruptcy petition
26 against the Debtor.¹ Prior to the involuntary petition, the Debtor practiced in the areas of

27 ¹ The Petitioning Creditors also filed an involuntary chapter 7 bankruptcy petition
28 against Thomas V. Girardi, which is currently pending as Bankruptcy Case No. 2:20-bk-
21020-BR.

personal injury, defective products, sexual abuse, toxic torts, business law, employment law, and aviation law.

On December 24, 2020, the Petitioning Creditors filed a *Motion for Appointment of Interim Trustee Pursuant to 11 U.S.C. § 303(g)* [Docket No. 12]. The Court entered an order granting the motion on January 5, 2021 [Docket No. 45]. On January 6, 2021, the Trustee was appointed as the interim trustee [Docket No. 50].

On January 13, 2021, the Court entered an *Order Directing: (1) The Clerk of Court to Immediately Enter an Order for Relief under Chapter 7; (2) The United States Trustee to Immediately Appoint a Chapter 7 Trustee; (3) The Debtor to File All Schedules and Related Documentation for Chapter 7 Case within Fourteen Days of the Entry of this Order; and (4) Vacating February 16, 2021 Status Conference* [Docket No. 68]. On January 13, 2021, the Clerk of Court entered an order for relief against the Debtor [Docket No. 69], and the Trustee was appointed and accepted her appointment in the Debtor's case [Docket No. 71].

B. Cases to Be Abandoned

Based on the Debtor's records, and discussions with co-counsel and/or opposing counsel, the Trustee has determined that the cases below (the "Cases") fall into two categories with respect to the Debtor's quantum meruit claim for fees: (1) the Debtor abandoned the client and therefore waived its right to fees; or (2) the Debtor did little to no substantive work on the case. With respect to costs, the Trustee has agreed to waive costs if the Debtor appears to have abandoned the client.

Case Name/Number	Requested Result
Baker v. GHS Interactive Security Ventura County Superior Court Case No. 56-2019-00526352-CU-BC-VTA (Keith Griffin)	Abandon fees and any costs
Sertic v. Garcia, Kern County Superior Court Case No. BCV-19-103330	Abandon fees and any costs
Crisp v. The Green Sheet et al., San Bernardino Superior Court, Case No. CIVDS18261	Abandon fees, but not costs of \$1,155.23
Vides v. LA Unified School District, Los Angeles Superior Court, Case No. BC690036 (Brian Breiter)	Abandon fees and any costs

1 **III. MEMORANDUM OF POINTS AND AUTHORITIES**

2 Section 554 of the Bankruptcy Code provides that “the trustee may abandon any
3 property of the estate that is burdensome to the estate or that is of inconsequential value and
4 benefit to the estate.” *See* 11 U.S.C. § 554. “Abandonment requires affirmative action or
5 some other evidence of intent by the trustee.” *Stein v. United Artists Corp.*, 691 F.2d 885, 890
6 (9th Cir. 1982) (citations omitted). In *In re K.C. Machine and Tool Company*, 816 F.2d 238
7 (6th Cir. 1987), the court held that before ordering abandonment, the court must find either (1)
8 the property is burdensome to the estate; or (2) the property is both of inconsequential value
9 and inconsequential benefit to the estate. *See id.* At 245. Abandonment is effective *nunc pro*
10 *tunc* as of the filing date of the debtor’s bankruptcy petition. *Brown v. O’Keefe*, 300 U.S. 598
11 (1973); *Mason v. C.I.R.*, 646 F.2d 1039 (9th Cir. 1980); *In re Hat*, 363 B.R. 123 (Bankr. E.D.
12 Cal. 2007).

13 The Trustee has determined that the Cases are of inconsequential value and benefit to
14 the Estate. The Trustee does not believe that there is a good faith basis for a quantum meruit
15 claim in these cases because the Debtor either did not do much, or any work, or because the
16 Debtor appears to have abandoned the clients. In the latter cases, the Trustee also believes that
17 it is appropriate to waive costs under applicable law. The alternative would be litigation to
18 establish the Estate’s entitlement to fees on a quantum meruit basis and given the facts in these
19 cases, the Trustee does not believe she would be likely to prevail. Accordingly, in the exercise
20 of the Trustee’s business judgment, she seeks an order authorizing the abandonment of fees in
21 the above cases and costs where indicated.

22
23 **IV. CONCLUSION**

24 Accordingly, the Trustee respectfully requests that the Court enter an order providing
25 for the following relief:

- 26 1. Granting the Motion;
27 2. Authorizing the Trustee to abandon the Cases pursuant to 11 U.S.C. § 554; and
28

3. For such other and further relief as this Court deems just and proper.

Respectfully submitted,

Dated: April 4, 2024

RAINES FELDMAN LITRELL LLP

By: /s/ Kyra E. Andrassy

Kyra E. Andrassy
Attorneys for Elissa D. Miller, Chapter 7
Trustee

DECLARATION OF ELISSA D. MILLER

I, Elissa D. Miller, declare as follows:

1. I am the duly appointed Chapter 7 Trustee for the bankruptcy estate of Girardi Keese. I am also a partner at Greenspoon Marder, LLP. I know each of the following facts to be true of my own personal knowledge, except as otherwise stated and, if called as a witness, I could and would competently testify with respect thereto. I make this declaration in support of my third motion to abandon quantum meruit claims for fees and costs ("Motion"). Unless otherwise defined in this declaration, all terms defined in the Motion are incorporated herein by this reference.

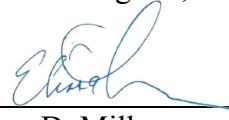
2. Based on the Debtor's records, and discussions with co-counsel and/or opposing counsel, I have determined that the cases below (the "Cases") fall into two categories with respect to the Debtor's quantum meruit claim for fees: (1) the Debtor abandoned the client and therefore waived its right to fees; or (2) the Debtor did little to no substantive work on the case. With respect to costs, I have agreed to waive costs if the Debtor appears to have abandoned the client.

Case Name/Number	Requested Result
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Crisp v. The Green Sheet et al., San Bernardino Superior Court, Case No. CIVDS18261	Abandon fees, but not costs of \$1,155.23
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3. The alternative to abandonment would be to litigate the Estate's entitlement to fees and to costs, and given the circumstances in the above cases, I do not believe the Estate would be likely to establish any claim.

1 I declare under penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct.

3 Executed on this 4th day of April, 2024, at Los Angeles, California.

4 

5 _____
Elissa D. Miller

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626.

A true and correct copy of the foregoing document entitled (*specify*): **THIRD MOTION TO ABANDON QUANTUM MERUIT CLAIMS AND COSTS UNDER 11 U.S.C. § 554; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF ELISSA D. MILLER IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **4/4/2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **4/4/2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Barry Russell

United States Bankruptcy Court
Edward R. Roybal Federal Building
255 E. Temple Street, Suite 1660
Los Angeles, CA 90012

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **4/4/2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/4/2024

Ja'Nita Fisher

/s/ Ja'Nita Fisher

Date

Printed Name

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Kyra E Andrassy kandrassy@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- Rafey Balabanian rbalabanian@edelson.com, docket@edelson.com;5926930420@filings.docketbird.com
- Michelle Balady mb@bedfordlg.com, leo@bedfordlg.com
- Robert D Bass bob.bass47@icloud.com
- Reem J Bello rbello@goeforlaw.com, kmurphy@goeforlaw.com
- Kate Benveniste kate.benveniste@gtlaw.com, mowent@gtlaw.com,kate-benveniste-1498@ecf.pacerpro.com
- Leslie A Berkoff lberkoff@moritthock.com, hmay@moritthock.com
- Carl Berthold cberthold@apjuris.com
- Ori S Blumenfeld oblumenfeld@lakklawyers.com, ncondren@lakklawyers.com;smcfadden@lakklawyers.com
- Clifford Bordeaux cliff@bordeauxlaw.com, BordeauxLawPC@jubileebk.net
- Evan C Borges eborges@ggtriallaw.com, cwinsten@ggtriallaw.com
- William E Brueckner wbrueckner@woodsoviatt.com
- Richard Dennis Buckley rbuckley@safarianchoi.com
- Steve Burnell Steve.Burnell@gmlaw.com, sburnell@ecf.courtdrive.com;sburnell@ecf.inforuptcy.com;cheryl.caldwell@gmlaw.com;denise.walker@gmlaw.com
- Glenn Ward Calsada glenn@calsadalaw.com, lnw@calsadalaw.com;glennccalsada@gmail.com,niko@calsadalaw.com,lauren@calsadalaw.com,pat@calsadalaw.com
- Indira J. Cameron-Banks indira@cameronjones.law, tiffany@cameronbanksllaw.com
- Kathryn M.S. Catherwood kcatherwood@grsm.com, mbrookman@grsm.com;sdurazo@grsm.com;jswanson@grams.com
- Michael F Chekian mike@cheklaw.com, chekianmr84018@notify.bestcase.com
- Fang Chen fang@fangchenlaw.com
- Marie E Christiansen mchristiansen@vedderprice.com, ecfladocket@vedderprice.com,marie-christiansen-4166@ecf.pacerpro.com
- Baruch C Cohen bcc@BaruchCohenEsq.com, paralegal@baruchcohenesq.com
- Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;clare@lesliecohenlaw.com
- Jennifer Witherell Crastz jcrastz@hrhlaw.com
- Ashleigh A Danker adanker731@gmail.com
- Richard T Egger richard.egger@bbklaw.com, linda.tapia@bbklaw.com
- Lei Lei Wang Ekvall - DECEASED - lekvall@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- Richard W Esterkin richard.esterkin@morganlewis.com
- Oscar Estrada oestrada@ttc.lacounty.gov
- Timothy W Evanston tevanston@raineslaw.com, gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- Jeremy Faith Jeremy@MarguliesFaithlaw.com, Angela@MarguliesFaithlaw.com;Vicky@MarguliesFaithlaw.com
- Robert W Finnerty rfinnerty@actslaw.com, fpedro@actslaw.com
- James J Finsten jfinsten@hotmail.com
- James J Finsten jfinsten@lurie-zepeda.com, jimfinsten@hotmail.com
- Alan W Forsley alan.forsley@flpllp.com, awf@fklawfirm.com,awf@fl-lawyers.net,addy@flpllp.com
- Michael E Friedman MichaelFriedmanLaw@gmail.com
- Steven R. Friedman stevenrfriedman@gmail.com
- Larry W Gabriel lgabrielaw@outlook.com, tinadow17@gmail.com
- James B Glucksman jbg@dhclegal.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- Eric D Goldberg eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com

- Rosendo Gonzalez rossgonzalez@gonzalezplc.com, rgonzalez@ecf.axosfs.com; jzavala@gonzalezplc.com; zig@gonzalezplc.com; gig@gonzalezplc.com
- Andrew Goodman agoodman@andyglaw.com, Goodman.AndrewR102467@notify.bestcase.com
- Suzanne C Grandt suzanne.grandt@calbar.ca.gov, joan.randolph@calbar.ca.gov
- Steven T Gubner sgubner@bg.law, ecf@bg.law
- Asa S Hami asa.hami@gmlaw.com, ahami@ecf.courtdrive.com; patricia.dillamar@gmlaw.com; pdillamar@ecf.courtdrive.com
- Brian T Harvey bharvey@buchalter.com, docket@buchalter.com; dbodkin@buchalter.com
- Stella A Havkin stella@havkinandshrago.com, shavkinesq@gmail.com
- James Andrew Hinds jhinds@hindslawgroup.com; mduran@hindslawgroup.com, mduran@hindslawgroup.com
- Marshall J Hogan mhogan@swlaw.com, fcardenas@swlaw.com
- Bradford G Hughes bhughes@Clarkhill.com, mdelosreyes@clarkhill.com
- Sheryl K Ith sith@cookseylaw.com
- Razmig Izakelian razmigizakelian@quinnemanuel.com
- Steven D Jerome sjerome@swlaw.com
- Lillian Jordan nefrecipients@donlinrecano.com, RMAPA@DONLINRECANO.COM
- Alphonse Lamoreaux MKebeh@allenmatkins.com
- Molly J. Kjartanson mkjartanson@swlaw.com
- Michael S Kogan mkogan@koganlawfirm.com
- Kenneth A Kotarski KKOTARSKI@HAMRICKLAW.COM, hmartindale@HAMRICKLAW.COM; pliscano@hamricklaw.com; gknopfler@hamricklaw.com; khearn@hamricklaw.com; secretary2@hamricklaw.com; sjustice@hamricklaw.com; jpoole@hamricklaw.com
- Lewis R Landau Lew@Landaunet.com
- Janet A Lawson jlawsonlawyer@gmail.com, G38570@notify.cincompass.com
- Daniel A Lev daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com; dlev@ecf.courtdrive.com
- Marc A Lieberman marc.lieberman@flpllp.com, safe.saleem@flpllp.com, addy@flpllp.com
- Elizabeth A Lombard elombard@zwickercpc.com, bknotices@zwickercpc.com
- Noreen A Madoyan Noreen.Madoyan@usdoj.gov
- Aaron J Malo amalo@sheppardmullin.com, abilly@sheppardmullin.com; rgolder@sheppardmullin.com
- Kathleen P March kmarch@bkylawfirm.com, kmarch3@sbcglobal.net, kmarch@sbcglobal.net
- Craig G Margulies Craig@MarguliesFaithlaw.com, Vicky@MarguliesFaithlaw.com; Angela@MarguliesFaithlaw.com
- Ron Maroko ron.maroko@usdoj.gov
- Damian J. Martinez dmartinez@leechtishman.com, mmocciaro@leechtishman.com
- Peter J Mastan peter.mastan@dinsmore.com, SDCMLFiles@dinsmore.com; Katrice.ortiz@dinsmore.com
- Edith R. Matthai ematthai@romalaw.com, lrobie@romalaw.com
- Daniel J McCarthy dmccarthy@hillfarrer.com, spadilla@hillfarrer.com; dflowers@hfbllp.com
- Dennis E McGoldrick dmccgoldricklaw@yahoo.com, demcg@demcg.com
- Elissa Miller (TR) CA71@ecfcbis.com, MillerTrustee@gmlaw.com; C124@ecfcbis.com; cheryl.caldwell@gmlaw.com; cheryl.caldwell@ecf.courtdrive.com
- Eric A Mitnick MitnickLaw@gmail.com, mitnicklaw@gmail.com
- Byron Z Moldo bmoldo@ecjlaw.com, aantonio@ecjlaw.com, dperez@ecjlaw.com
- Kevin H Morse kmorse@clarkhill.com, blambert@clarkhill.com
- Glenn D. Moses gmoses@venable.com, cascavone@venable.com; ipmalcolm@venable.com; jadelgado@venable.com
- Gilbert M Nishimura gnishimura@snw-law.com, schin@snw-law.com; sgalingo@snw-law.com; ffilimona@snw-law.com
- Scott Olson scott.olson@bclplaw.com, scott-olson-2161@ecf.pacerpro.com, ecfsfdocket@vedderprice.com, nortega@vedderprice.com
- Aram Ordubegian ordubegian.aram@arentfox.com
- Carmela Pagay ctp@lnbyg.com

- Leonard Pena lpena@penalaw.com, penasomaecf@gmail.com;penalr72746@notify.bestcase.com
- Matthew D Pham mpham@allenmatkins.com, mdiaz@allenmatkins.com
- Christopher L Pitet cpitet@apjuris.com, bferik@apjuris.com
- Christopher E Prince cprince@lesnickprince.com,
jmack@lesnickprince.com;cprince@ecf.courtdrive.com;jnavarro@lesnickprince.com
- Amy Quartarolo amy.quartarolo@lw.com, laura.pumerville@lw.com;amy-quartarolo-
2972@ecf.pacerpro.com
- Michael J Quinn mquinn@vedderprice.com, ecfladocket@vedderprice.com,michael-quinn-
2870@ecf.pacerpro.com,adavis@vedderprice.com
- Dean G Rallis drallis@hahnlawyers.com,
jevans@hahnlawyers.com;drallis@ecf.courtdrive.com;jevans@ecf.courtdrive.com
- Ronald N Richards ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- Karen Rinehart krinehart@omm.com, karen-rinehart-3320@ecf.pacerpro.com
- Kevin C Ronk Kevin@portilloronk.com, Attorneys@portilloronk.com
- Frank X Ruggier frank@ruggierlaw.com
- William F Savino wsavino@woodsoviatt.com, lherald@woodsoviatt.com
- Scott A Schiff sas@soukup-schiff.com
- Daren M Schlecter daren@schlechterlaw.com, assistant@schlechterlaw.com
- Kenneth John Shaffer johnshaffer@quinnemanuel.com
- Amir Shakoorian AShakoorian@GGTrialLaw.com
- Summer M Shaw ss@shaw.law, shawsr70161@notify.bestcase.com;shawsr91811@notify.bestcase.com
- Zev Shechtman Zev.Shechtman@saul.com,
zshechtman@ecf.inforuptcy.com;easter.santamaria@saul.com
- Anastasija Olegovna Snicarenko legal@flyxo.com, jennifer@cypressllp.com
- Howard Steinberg steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-
steinberg-6096@ecf.pacerpro.com
- Richard M Steingard , awong@steingardlaw.com
- Andrew Still astill@swlaw.com, kcollins@swlaw.com
- Annie Y Stoops annie.stoops@afslaw.com, yvonne.li@afslaw.com;kevin.chen@afslaw.com
- Philip E Strok pstrok@swelawfirm.com,
gcruz@swelawfirm.com;1garrett@swelawfirm.com;jchung@swelawfirm.com
- Jeffrey L Sumpter jsumpter1@cox.net
- Terrence Swinson terrenceswinson@gmail.com
- Tamar Terzian tterzian@hansonbridgett.com, ssingh@hansonbridgett.com
- Boris Treyzon btreyzon@actslaw.com, pjs@actslaw.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- Diane C Weil dcweil@dcweillaw.com,
diane.c.weil@Gmail.com,dweil@ecf.inforuptcy.com,jfiser@dcweillaw.com
- David R. Weinstein dweinstein@weinsteinlawfirm.net
- Andrew D. Weiss ADWeiss@oclawadw.com
- Sharon Z. Weiss sharon.weiss@bclplaw.com,
raul.morales@bclplaw.com,REC_KM_ECF_SMO@bclplaw.com
- Jessica Wellington jwellington@bg.law, ecf@bg.law
- Pauline White pauline@paulinewhite.com
- Eric D Winston ericwinston@quinnemanuel.com
- Christopher K.S. Wong christopher.wong@afslaw.com, yvonne.li@afslaw.com;kevin.chen@afslaw.com
- Robert M Yaspan court@yaspanlaw.com, tmenachian@yaspanlaw.com
- Timothy J Yoo tjy@lnbyb.com
- Isaac R Zfaty izfaty@muchlaw.com
- David B Zolkin dzolkin@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com
- Joshua del Castillo jdelcastillo@allenmatkins.com, mdiaz@allenmatkins.com